

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ISIAH KELLUP,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

§
§
§
§
§
§
§
§
§
§

C.A. NO. 4:22-cv-1652

**DEFENDANT BANK OF AMERICA, N.A.'S UNOPPOSED
MOTION TO SUBSTITUTE COUNSEL**

Defendant Bank of America, N.A. (“BANA”) hereby requests that the Court allow the substitution of George Robertson and David Hornbeak of Holland & Knight LLP, as counsel of record for BANA, in place of Connie Flores Jones of Winston & Strawn LLP.

Counsel for BANA has conferred with counsel for Plaintiff regarding BANA’s request to substitute counsel, and Plaintiff does not oppose BANA’s request. Therefore, BANA’s motion to substitute counsel is unopposed.

WHEREFORE, PREMISES CONSIDERED, BANA prays that this Court grant its motion and allow George Robertson and David Hornbeak of Holland & Knight LLP to be substituted as counsel of record for BANA in place of Connie Flores Jones of Winston & Strawn LLP, and for such other and further relief as this Court deems appropriate.

Dated: June 2, 2022

Respectfully submitted,

By: /s/ George G. Robertson

George G. Robertson

Texas Bar No. 24106352

Email: George.Robertson@hklaw.com

David Hornbeak

Texas Bar No. 24106113

Email: David.Hornbeak@hklaw.com

HOLLAND & KNIGHT LLP

811 Main Street, Suite 2500

Houston, TX 77002

Telephone: (713) 821-7000

Facsimile: (713) 821-7001

***SUBSTITUTING ATTORNEYS FOR
DEFENDANT BANK OF AMERICA, N.A.***

By: /s/ Connie Flores Jones

Connie Flores Jones

Texas Bar No. 00793736

Email: cflores@winston.com

WINSTON & STRAWN LLP

800 Capitol St., Suite 2400

Houston, TX 77002-2925

Telephone: (713) 651-2782

Facsimile: (713) 651-2700

***WITHDRAWING ATTORNEYS FOR
DEFENDANT BANK OF AMERICA, N.A.***

CERTIFICATE OF CONFERENCE

On June 2, 2022, I conferred via email with Clay Vilt, counsel for Plaintiff Isiah Kellup regarding the motion for substitution of counsel for Defendant Bank of America, N.A. Mr. Vilt stated that Plaintiff does not oppose the motion.

/s/ Connie Flores Jones
Connie Flores Jones

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of June 2022, I electronically filed the foregoing with the Clerk of Court and served the foregoing on Plaintiff's counsel of record Robert C. Vilt by using the CM/ECF system.

/s/ Connie Flores Jones
Connie Flores Jones